

Laura Vartain Horn (SBN 258485)  
**KIRKLAND & ELLIS LLP**  
555 California Street, Suite 2700  
San Francisco, CA 94104  
Telephone: (415) 439-1625  
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Telephone: (215) 268-5000  
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800  
jessica.davidson@kirkland.com

*Attorneys for Uber*

UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO SEAL PERSONAL  
IDENTIFYING INFORMATION  
CONTAINED IN DEFENDANTS' MOTION  
FOR ENTRY OF RECEIPTS ORDER AND  
ACCOMPANYING DOCUMENTS**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

**DEFENDANTS' STATEMENT IN SUPPORT OF SEALING CONFIDENTIAL MATERIALS**

Under Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC ("Uber" or "Defendants") hereby move this Court for an order to seal the personal identifying information ("PII") contained in its Motion for Entry of an Order to Show Cause Why 6 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with Prejudice, including all attached exhibits and declarations (altogether, the "Motion") and the accompanying Declaration of Brett D. Harrison and FTI Consulting, Inc. (the "FTI Declaration"). The Motion and FTI Declaration contain PII from materials produced by both Uber and Plaintiffs. The Motion and FTI Declaration are attached as Exhibit A, filed concurrently to this Administrative Motion.

A party seeking to seal a judicial record bears the burden of establishing that "compelling reasons" support that request. *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1178–79 (9th Cir. 2006). Specifically, that party must "articulate[] compelling reasons supported by specific factual findings ... that outweigh the general history of access and the public policies favoring disclosure [of court records], such as the public interest in understanding the judicial process." *Id.* (quoting *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003)). "In turn, the [C]ourt must 'conscientiously balance[] the competing interests' of the public and the party who seeks to keep certain judicial records secret." *Id.* (quoting *Foltz*, 331 F.3d at 1135).

Assessment of the public and private interests implicated here warrant sealing this information. Local Rule 79-5(c)(1)(i). Uber in particular seeks to seal the names of Plaintiffs, drivers, and other non-parties contained throughout the Motion and FTI Declaration, as well as home and other addresses,<sup>1</sup> contact information such as phone numbers and email addresses, and financial information. Courts have found that such information "is sealable under the compelling reasons standard." *See, e.g., Kumandan v. Google LLC*, No. 19-CV-04286-BLF, 2022 WL 17971633, at \*1–2 (N.D. Cal. Nov. 17, 2022). That is because such information is "not relevant to any of the issues in this litigation, nor would the public have

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<sup>1</sup> Uber proposes redacting all addresses, because Uber is not able to assess which addresses are potentially personally identifying.

any real interest in its disclosure.” *O’Connor v. Uber Techs., Inc.*, No. C-13-3826 EMC, 2015 WL 355496, at \*3 (N.D. Cal. Jan. 27, 2015). On the other hand, the public disclosure of the PII contained within the Motion and FTI Declaration could cause significant and avoidable harm or embarrassment to the affected individuals. Moreover, no less restrictive alternative to sealing the PII in the Motion and FTI Declaration is sufficient. Local Rule 79-5(c)(1)(iii). Uber’s request is narrowly tailored to seal only the PII while ensuring that the public retains access to the rest of the Motion and FTI Declaration. This Court may therefore “appropriately balance[]” the privacy interests of the affected individuals with the public’s right to access by allowing redaction of all such PII in the Motion. *O’Connor*, 2015 WL 355496, at \*2.

### **CONCLUSION**

For the foregoing reasons, Uber respectfully requests this Court grant this Administrative Motion to seal the personal identifying information, specifically the names, addresses, contact information, and financial information, contained in the Motion and FTI Declaration.

DATED: August 28, 2025

Respectfully submitted,

/s/ Laura Vartain Horn

Laura Vartain Horn (SBN 258485)  
**KIRKLAND & ELLIS LLP**  
555 California Street, Suite 2700  
San Francisco, CA 94104  
Telephone: (415) 439-1625  
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Telephone: (215) 268-5000  
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800  
jessica.davidson@kirkland.com

SABRINA H. STRONG (SBN: 200292)  
sstrong@omm.com  
JONATHAN SCHNELLER (SBN: 291288)  
jschneller@omm.com  
**O'MELVENY & MYERS LLP**  
400 South Hope Street, 19th Floor  
Los Angeles, CA 90071  
Telephone: (213) 430-6000  
Facsimile: (213) 430-6407

PATRICK L. OOT, JR. (*Pro Hac Vice*)  
oot@shb.com  
**SHOOK, HARDY & BACON, LLP**  
1800 K Street NW, 10th Floor  
Washington, DC 20006  
Telephone: (202) 783-8400  
Facsimile: (202) 783-4211

ALYCIA A. DEGEN (SBN: 211350)  
adegen@shb.com  
MICHAEL B. SHORTNACY (SBN: 277035)  
mshortnacy@shb.com

**SHOOK, HARDY & BACON, LLP**  
2121 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Telephone: (424) 285-8330  
Facsimile: (424) 204-9093

CHRISTOPHER V. COTTON (*Pro Hac*  
*Vice*) ccotton@shb.com  
**SHOOK, HARDY & BACON, LLP**  
255 Grand Boulevard  
Kansas City, MO 64108  
Telephone: (816) 474-6550  
Facsimile: (816) 421-5547

*Counsel for Defendants*  
UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC

*Attorneys for Uber*  
UBER TECHNOLOGIES, INC.,  
RASIER, LLC, And RASIER-CA, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on August 28, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Laura Vartain Horn  
Laura Vartain Horn